From: Caleb Dalton
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Subject: RE: Expert Deposition Availability - 2d Attempt
Date: Tuesday, August 23, 2016 7:28:26 PM
Attachments: logo108fa5

Counsel,

Below are available deposition dates for fact witnesses identified in Defendants and NCFP's joint initial disclosures.
Some of these witness were traveling in the last few weeks so it took us a little extra time to gather available dates.
We are still attempting to get a response from one witness and will supplement this chart as soon as we have those dates.

Witness	Preferred Dates/Times	Unavailable Dates	Location
D.H. (plaintiff & parent of minor children):	Aug. 26th 10 AM- 5 PM Aug. 29th 11 AM - 4 PM Aug. 30th 11 AM - 3 PM Sept. 1st 11 AM - 3 PM Sept. 6th 11 AM - 3 PM Sept. 7th 11AM - 3 PM	Aug. 24, 25, 27, 31st. Sept. 2-5th, 8-23rd.	Charlotte, NC
E.S. (fact witness & parent of minor children)	--	Sept. 5-11 Not available on any Tuesday	Charlotte, NC
D.H. (fact witness & parent of minor S.H.)	--	No current unavailable dates	Chicago, IL?
S.B. (fact witness & parent of minor children)	Mid-morning/early afternoon	August 23rd August 29th September 1st September 6th September 7th September 13th	Columbus, OH
Y.K. (plaintiff & parent	--	No current	Charlotte, NC

of minor children)		unavailable dates	
C.C. (fact witness & parent of minor children)	*(awaiting response)*	*(awaiting response)*	*Charlotte, NC*
R.F. (plaintiff & parent of minor children)	Prefer afternoons	No current unavailable dates	Sanford, N.C. (preferred) Fayetteville, N.C.

Best,
-Caleb

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Subject: Expert Deposition Availability - 2d Attempt

Dear Counsel:

The following was returned to me this morning, probably because I had exceeded the maximum number of outgoing e-mails my e-mail host would accept. I apologize for the confusion.

Defendant Intervenors Berger and Moore, Governor McCrory and North Carolinians for Privacy jointly provide the following available dates for their experts' depositions.

Name	Available Dates	Deposition in DC?
Paul W. Hruz, MD, PhD	9/7, 9, 21, 23, 30 and 10/3,5,7	Yes if necessary. If in St. Louis, needs to be off campus.
Allan M. Josephson, M.D.	**Not Available** 9/16, 19, 27-30 and 10/3	Yes
Lawrence S. Mayer, MD, MS, PhD.	Anytime in the AM	No
Quentin L. Van Meter, MD	9/28	Yes
Walt Heyer	9/7-14	Yes
Elizabeth Schultz	9/13 after 10:30 and 9/14 after 11:00	Yes
Kenneth Lanning	**Not Available** 9/12, 13, 16, 19-23, 27, 29-30 and 10/7	Yes
Tim Hutchinson	9/6-8	Yes
Courtnay Aycock	Available 9/9, 9/23, and 9/30 (preferred dates), Not available 9/16	Yes

I have the following dates for **fact witnesses** Robert M. Gallagher and Connor Gallagher: 9/1, 6, 7

and 12 Not in DC.

Since sending the e-mail, I have also learned that Tim Hutchinson is also available on Sept. 13,14,20,21, and 28.

Sincerely,

Robert D. Potter, Jr.
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Charlotte, NC 28209
www.rdpotterlaw.com
Telephone: (704) 552-7742

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